

# **EXHIBIT AC**

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,  
Petitioner,

v.

COREPHOTONICS, LTD.,  
Patent Owner.

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Case No. IPR2020-00896  
U.S. Patent No. 10,317,647

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PATENT OWNER'S RESPONSE

Case No. IPR2020-00896  
U.S. Patent No. 10,317,647

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1.	A POSITA would not have modified Ogino in view of Chen II and Bareau to render claims 2, 3 and 5 unpatentable.....	52
2.	A POSITA would not have modified Ogino in view of Chen II and Bareau to render claims 8-11 unpatentable. ....	58
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### **III. LEVEL OF ORDINARY SKILL**

Petitioner offers that a “person having ordinary skill in the art (“POSITA”) would include someone who had, at the priority date of the ’647 Patent, (i) a Bachelor’s degree in Physics, Optical Sciences, or equivalent training, as well as (ii) approximately three years of experience in designing multi-lens optical systems.” Pet. at 7. Further, “[s]uch a person would have had experience in analyzing, tolerancing, adjusting, and optimizing multi-lens systems for manufacturing, and would have been familiar with the specifications of lens systems and their fabrication.” *Id.* Petitioner also submits that “a POSITA would have known how to use lens design software such as Codev, Oslo, or Zemax, and would have taken a lens design course or had equivalent training.” *Id.* Patent Owner does not disagree with Dr. Durand’s definition of a POSITA. Ex. 2001, Milster Decl., ¶20.

### **IV. CLAIM CONSTRUCTION**

Petitioner notes that two terms, “Effective Focal Length (EFL)” and “Total Track Length (TTL),” have previously been construed in relation to other patents that share a common specification with the ’647 Patent. Pet. at 8. Specifically, the Board construed these two terms in IPR2018-01140 as follows: